REMARKS

Reconsideration and allowance in view of the following remarks is respectfully requested.

Claims 10-11 and 13-18, remain pending in the application. These claims are maintained without amendment.

The rejection of claims 10-11 under 35 U.S.C. § 103(a) as being unpatentable over *I-Logix Introduces Wizard-Based Documentation Product for Web Publishing to Facilitate Team Collaboration* (8 May 2000, hereafter I-Logix), and further in view of Ferrucci et al. (US 7131057, filed 4 February 2000, hereafter Ferrucci), is respectfully traversed.

It is well settled that "the reference must be enabling and describe the applicant's claimed invention sufficiently to have placed it in possession of a person of ordinary skill in the field of the invention." *In re Paulsen*, 30 F.3d 1475, 1478-79 (Fed. Cir. 1994). It is submitted that the I-Logix reference is not enabling for the steps against which it is cited as allegedly disclosing. For example, the rejection advances that I-Logix discloses:

> generating of documentary fragments of the model with a requirements management tool (page 1, paragraph 2: Here, the documentary fragments are generated in the Rhapsody environment)

However, paragraph 2 discloses:

> Rhapsody Reporter allows software developers to easily select design components for documentation and share object-oriented design information including Unified Modeling Language (UML) diagrams and code. By generating customized documentation from the Rhapsody environment and outputting the data in RTF, HTML, Framemaker, or

Microsoft word formats, developers are empowered to
collaborate with colleagues, review designs remotely over the
Web and ultimately reduce the product development cycle.

It is submitted that the term "documentary fragments" is neither found in nor suggested in a manner that the reader of ordinary skill would be led to the conclusion that this paragraph suggest "generating of documentary fragments of the model with a requirements management tool." Indeed, this paragraph is more a sales blurb that sings the praise of the Rhapsody Reporter software.

The next step of opening a document with a text processor (page 1, paragraphs 3-4) is alleged to be disclosed in paragraphs 3 and 4. This is also traversed.

Paragraph 3 is directed to how document generation capability is "dramatically" improved and that "Rhapsody Reporter is the most complete and cost-effective documentation solution in the industry." There is no document being 'opened' disclosed or suggested. Paragraph 4 is such as to set forth:

Utilizing pre-defined access mechanisms and flexible query
engines, Rhapsody Reporter organizes software design
information into easily navigated Web-enabled documents.
Wizard-based Rhapsody Reporter uses two primary dialog
windows. The first window asks what type of information,
such as diagrams, code, and descriptions Reporter should
retrieve from the Rhapsody environment. The second dialog
box, depending on the desired information, allows
customized options for the ordering and formatting of
particular design elements. The report is then generated and
placed in a user-defined directory in the appropriate file
formats. For example, for output in Microsoft Word, Reporter
builds a .DOC file with the Title and Table of Contents
pages. This output results in a standalone file of mixed

tables, text and graphics that can be easily copied and shared with others.

At best, this paragraph suggests that the Rhapsody Reporter generates a report in "a user-defined directory in the appropriate file formats. For example, for output in Microsoft Word." However, again there is no disclosure or suggestion of "opening" a document with a text processor.

Next, the rejection asserts that I-Logix discloses:

selecting of the model including the documentary information and of the generator of documentary fragments (page 1, paragraph 3: Here, a customizable template is selected. This template publishes content from the UML design into an output document in the form of RTF, HTML, Framemaker, and Microsoft® Word® formats (paragraph 2))

However, paragraph 3 discloses:

"Rhapsody Reporter dramatically improves the documentation generation capability, in terms of speed of production, format, accuracy, and completeness. Predefined reports combined with a customizable template generation greatly enhance the ability to publish, share, and collaborate UML design content," said Jim McElroy, director of Rhapsody Product Marketing, I-Logix Inc. "We looked at several documentation solutions, and ATA's technology had by far the most functionality and was the easiest to use. With ATA, Rhapsody Reporter is the most complete and cost-effective documentation solution in the industry."

The disclosure that "Predefined reports combined with a customizable template generation greatly enhance the ability to publish, share, and collaborate UML design

content" does not actually suggest that a selected template "publishes content from the UML design into an output document in the form of RTF, HTML, Framemaker, and Microsoft® Word® formats" as advanced in this rejection. It is submitted that the rejection extrapolates way beyond the disclosure of this reference and is flavored with a full working knowledge of the claimed subject matter.

Next, the rejection asserts that I-Logix discloses "inserting of the documentary fragments generated into the documentary structure of the documentary chain (page 1, paragraphs 1-2: Here, the documentary fragments are inserted into the UML diagrams and code). However, paragraphs 1 and 2 of I-Logix are such as to disclose:

> I-Logix Inc., a leading provider of enterprise solutions for embedded applications development, today introduced Rhapsody Reporter, an add-on product to I-Logix' award-winning Rhapsody 2.3. Based on technology developed by ATA Incorporated, a software development productivity tools company, Rhapsody Reporter enables developers to quickly navigate, select, extract and publish design information from a project designed with Rhapsody in a variety of common formats, including Web publishing in HTML. This new capability greatly extends the current Rhapsody report generation capability by adding wizard controlled template creation, optimized content selection, and highly customizable output formatting.

> Rhapsody Reporter allows software developers to easily select design components for documentation and share object-oriented design information including Unified Modeling Language (UML) diagrams and code. By generating customized documentation from the Rhapsody environment and outputting the data in RTF, HTML,

> Framemaker, or Microsoft word formats, developers are
> empowered to collaborate with colleagues, review designs
> remotely over the Web and ultimately reduce the product
> development cycle.

Again, it is submitted that the term "fragments" is not found in this disclosure and that there is nothing to lead the reader of ordinary skill to this conclusion let alone lead the reader to the understanding that this suggests inserting of the documentary fragments generated into the documentary structure of the documentary chain, as claimed. The positions taken in this rejection are simply not tenable.

Indeed, the assertion that I-Logix discloses:

> selecting a fragment whose structure echoes the
> architecture of the packages of the starting model (page 1,
> paragraph 4: Here, a user activates a wizard dialog window.
> The first dialog window allows the user to specify a type of
> information, such as diagrams, code, and descriptions. The
> type defines a structure of the data).

Is incorrect. Paragraph 4 is quoted above. It cannot be seen that this paragraph discloses selecting a fragment whose structure echoes the architecture of the packages of the starting model. The fact that the Rhapsody Reporter is wizard based does nothing to alleviate this shortcoming.

The rejection continues to assert that I-Logic discloses inserting the selected fragment at its location in the document (page 1, paragraph 4: Here, based upon the inputs received in the dialog boxes, the appropriate fragments are inserted into the output document). This misses the point that the dialog boxes would require manual consideration and input - *ergo* the name "dialog" box.

Note that it is disclosed that the first window <u>asks</u> what type of information, such as diagrams, code, and descriptions the Reporter should retrieve from the Rhapsody

environment. This would not go unnoticed by the reader of ordinary skill and lead in the direction of relying on a decision by a user.

The rejection then admits that I-Logix fails to specifically disclose loading of a structured model into a modeling tool;

wherein the structure relates to a tree structure, and

wherein the update of the documentation is performed with the aid of dynamic links established for each fragment generated between its location in the description for project data and its physical file arising from the automatic documentary generation.

To overcome this, the Examiner turns to official notice and asserts that it is notoriously well known in the art at the time of the applicant's invention to load a structured model into a modeling tool, thereby allowing a user to select a model to process. The impetus to consider this is asserted to be that it would have been obvious to one of ordinary skill in the art at the time of the applicant's invention to have combined the well known with I-Logix, since it would have allowed a user to select a model to process.

However, the rejection already covers this point with the discussion of a customizable template allegedly being selectable. How this apparent duplication is to be resolved by the reader of ordinary skill is not clear and is seen as further rendering the rejection untenable.

In this rejection, Ferrucci is cited as disclosing that the update of a documentation is performed with the aid of dynamic links established for each fragment generated between its location in the description for project data and its physical file arising from the automatic documentary generation (Figure 1; column 5, lines 29-47), and that the structure relates to a tree structure (column 1, line 57- column 2, line 4). It is then asserted that it would have been obvious to one of ordinary skill in the art at the time of the applicant's invention to have combined Ferrucci with I-Logix, since it would have allowed a user to maintain relations between a model and a generated document.

Just what "relationship" is intended or is believed to be suggested, is not clear and is so nebulous as to render this position untenable.

The rejection of claims 13 and 15-16 under 35 U.S.C. § 103(a) as being unpatentable over I-Logix and Ferrucci and further in view of "Bringing It All Together" (July 2002, hereafter BIAT), is respectfully traversed.

The citation of BIAT does nothing obviate all of the problems and shortcomings of the analysis of the I-Logic reference and therefore provides nothing that would enable a *prima facie* case of obviousness to be established.

The rejection of claim 17 under 35 U.S.C. § 103(a) as being unpatentable over I-Logix and Ferrucci and further in view of Tice et al. (US 2003/0182163, filed 25 February

2002).

The citation of Trice et al. does nothing obviate all of the problems and shortcomings of the analysis of the I-Logic reference and therefore provides nothing that would enable a *prima facie* case of obviousness to be established.

The rejection of claim 18 is rejected under 35 U.S.C. § 103(a) as being unpatentable over I-Logix and Ferrucci, and further in view of Pastor et al. (US 6681383, filed 4 April 2000, hereafter Pastor).

The citation of Pastor does nothing obviate all of the problems and shortcomings of the untenable analysis of the I-Logic reference and therefore provides nothing that would enable a prima facie case of obviousness to be established.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the present application should be in condition for allowance and a Notice to that effect is earnestly solicited.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 07-1337 and please credit any excess fees to such deposit account.

Respectfully submitted,
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